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Comments:

December 16, 2005 By electronic delivery. Ms. Jennifer J. Johnson Secretary Board of Governors of the Federal Reserve System 20th Street and Constitution Avenue, NW Washington, DC 20551 Truth in Lending/Regulation Z Advance Notice of Proposed Rulemaking Docket No. R1217 Federal Register Dear Ms. Johnson, Comerica Incorporated is pleased to submit our comments to the Federal Reserve Board's request for comment on an advance notice of proposed rulemaking ("ANPR") to begin a review of the open-end credit rules of the Board's Regulation Z, which implements the Truth in Lending Act ("TILA"). The ANPR seeks comments on a variety of specific issues. Three categories in particular we wish to offer comment on are: minimum payment warnings, late payment fees and high loan-to-value mortgage credit. The following comments are provided on behalf of Comerica Incorporated, a \$52 billion bank holding company located in various states including California, Florida, Michigan Arizona and Texas. Comerica appreciates the opportunity to comment on this ANPR. Comments • Minimum Payment Warning – Questions #66-#69 – Deal with the proposal that creditors must provide on each periodic statement a standardized warning about the effect of making only minimum payments. Comerica believes that overall, the basic need for informing customers of the effect of making only minimum payments is sound. We would add that we would like creditors to be permitted to use a representative example consistent with the Regulation Z provisions for disclosure of the Historical Example. This would permit creditors to disclose a typical percentage calculation based on the particular type of open-end product. We would also like to add that question #68 specifically, should remain an option and not a requirement. For question #69, we would suggest that since the customers would always have the option to receive their specific time period to pay off the balance by calling the proposed toll-free number, the additional programming costs to include each consumer's payoff time period on their periodic statement, would be unnecessarily costly due to the complexity of the required programming. The consumer can get specific information by contacting the creditor. • Late Payment Fees – Questions #97-#101 – Deal with the proposal that creditors disclose on each periodic statement the earliest date on which a late payment fee may be charged, as well as the amount of the fee. Comerica believes that the proposal for disclosure of the earliest date and the amount of any late fee is already being

addressed by the current requirement of Regulation Z to include the statement “due date”. We also anticipate any additional disclosure could actually encourage some customers to pay their accounts late. • High Loan-to-Value Mortgage Credit – Questions #102-#105 – Deal with the proposal that creditors must provide additional disclosures at the time of application and in advertisements that would warn consumers that interest on the portion of the loan that exceeds the home’s fair-market value would not be tax deductible. Comerica believes that this proposal is a valid recommendation that would better inform consumers comparing various types of products for their loan needs. We would recommend for Questions #102 and #104 that this disclosure be added as a standard disclosure on all home equity loan requests including placing it on the “When Your Home is On the Line” brochure. We would also suggest that additional guidance on Question #105 be provided to ensure consistent compliance with this requirement; taking into consideration that this information is not generally available at the time of application for all products. We would suggest that this disclosure be provided consistently to all applicants in the same manner. On behalf of Comerica Incorporated, we appreciate the opportunity to provide our comments on this important topic. C. Vance Borngesser Bonnie G. Cohn Vice President and Legal Counsel First Vice President Corporate Legal Corporate Public Affairs/Compliance Unit Cc: James M. Garavaglia Jon W. Bilstrom